



SEP 16 1999

September 10, 1999

**Kings County  
Water District**

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Rick Breitenbach  
CalFed Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

**RE: CalFed Bay-Delta Program Public Comment**

Dear Mr. Breitenbach:

**Board of Directors**

Steven P. Dias  
*President*

Michael Murray  
*Vice President*

Barry H. McCutcheon

Joseph Freitas

Ernest A. Taylor

**General Manager**

Don Mills

Enclosed you will find my public comments regarding the above referenced subject.

Sincerely,

Don Mills  
General Manager

LDMCalfed1.99

Enclosure:



CALFED  
BAY-DELTA  
PROGRAM

# Public Comment

Date Sept. 9, 1999

The CALFED Bay-Delta Program welcomes your participation. Please use the space below for your written comments (attach additional sheets if necessary).

Comments:

Rick — enclosed are my  
four pages of written comments.  
Sorry that they are mostly negative,  
but many of us in the San Joaquin  
Valley feel like we are the statue,  
and CALFED is the pigeon.

Don Mills

Name: Don Mills

Organization: Kings County Water District

Would you like to be added to  
our mailing list?

Address: 200 W. Campus Dr.

☐ Check Here

Hanford Ca 93230

559  
Phone: 584-6412 Fax: 584-6882

Please return this form to:



CALFED  
BAY-DELTA  
PROGRAM

1416 Ninth St., #1155  
Sacramento, CA 95814

For more information,  
(916) 657-2666  
(800) 700-5752  
<http://calfed.ca.gov>

## CALFED Revised Comments

The people within the District I represent have many areas of concern with the current direction of the Cal-Fed Program. It appears that given the mismatch between Bay-Delta water supplies and projected beneficial uses, the Program's Revised Phase II Report fails to address the true impacts of 20 million more people trying to share the same water supply that 30 million Californians currently fight over. If all of the "new" Californians use about 300 gallons of water per day like the rest of us, they will need 6.6 million-acre feet of water every year. You list your supply options as 1- Urban and ag water use efficiency. 2- Urban recycling. 3- Active conjunctive use. 4- Voluntary water transfers made possible through conservation or ag land fallowing. 5- New storage. Four out of five of your supply options create no new real water.

1) The water conserved by agriculture and the cities in this valley will remain here. We are in an overdrafted groundwater basin and the water that we conserve will reduce the amount of groundwater pumped. It will not result in some new supply that can be redirected. 2) Increased urban recycling is on everyone's wish list. Much of our cities' wastewater is already being put to beneficial uses. Most of the valley cities use groundwater as the only supply, and as they grow they will pump more groundwater that can be recycled, but this creates no new water, only recycled groundwater. 3) Conjunctive use is what we have been doing for 50 years. It is not a new supply; it's how we deal with our surface water shortage. 4) Transfers and ag land fallowing create no new water. They take resources and jobs and the economy from one area and move it to another. 5) Only surface storage can create new water. Your report has a list of 12 potential projects that will be studied. My wish would be to construct all of them, but your report indicates that 6 million acre-feet of new storage is the maximum amount needed or maybe none at all. When I do the math for 20 million more people using 300 gallons of water per day it comes to 6.6 million more acre-feet. But it takes 900 gallons of water per day to grow the food that they will eat. So unless we tell them that they can come in but they can't eat, we will need an additional 20 million-acre feet of dependable water supply to grow their food. Maybe they could buy their food from another country, but I like mine grown here in California where we have the strictest pesticide regulations in the world and I know the food is safe. Some of your water supply options take water away from the productive land that will feed them. The problems that 20 million more

people create will not be solved by "improving access to existing supplies," or by more "flexible water supply management," or by another Cal-Fed catchphrase "increased utility of the available water supply." These problems will only be solved if you increase our ability to store excess surface water in wet years and save it till needed.

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**Throughout** the 4,600-page document you reinforce the fact that additional storage makes the program goals achievable. It makes existing supplies more reliable, more flexible and enhances management for better water quality system-wide. We fully support additional groundwater and surface water storage projects up to and over your maximum goal of 6 million-acre feet. We implore you to have the will to resist the "do nothing" approach to surface storage that the environmental extremist push. This would force water rationing on all Californians.

**We support** the enlargement of Millerton Lake, on the San Joaquin River, by 720,000 acre-feet. This project could set an example of how a multi purpose facility would benefit all of the CalFed goals. Ecosystem restoration on the San Joaquin River has been a long-term issue that only new upstream storage can solve. The water quality of the south Delta would be enhanced by any timely release of the high quality San Joaquin water. A new reservoir would be able to hold back the damaging flood flows of the river and protect not only downstream property and life, but to ease the strain on the Delta levee system during high flows. The increased storage will ease the San Joaquin Valley's long-term groundwater overdraft problem, increase water use efficiency and make water transfers more timely and beneficial without additional conveyance facilities. The additional increase in recreation and clean hydroelectric power would benefit everyone in the state.

**A reservoir** on Silver Creek of the maximum size could take advantage of El Nino type years to catch surplus water supplies and store them south of the Delta. It could lessen the negative impacts of the ESA to Delta exporters and help mitigate the effects of our latest Delta smelt fiasco. These are solid projects that need to be constructed, not studied during Phase I, debated during Phase II, and found politically unpopular in Phase III. Only 1.3% of your proposed Phase I spending goes to surface storage study, and not one dollar to construction. This is unacceptable.

**You see** we know how easy it is to kill a proposed surface storage project, no matter how beneficial it would be. Studies can last decades while administrations change, environmental laws change, and after 20 years of study and debate - one endangered weed (slender-horned spine-flower) or one endangered rat or one Longhorn elderberry beetle blocks the wishes of the majority and the project dies. We feel that your spending timeline for environmental enhancement and other objectives should not get so far ahead of funding for storage that, oops - we've run out of money, or oops, the new Governor changed his or her mind.

**The fragile** optimism that we have tried to maintain during this CalFed process has been severely damaged by the handling of the June Delta smelt pumping halt. Despite assurances in the Bay-Delta Accord that this type of incident wouldn't happen, the water users have a 500,000 acre-foot hole in next year's water supply. Is this the kind of "adaptive management" of Delta water supplies and commitments that we can look forward to under CalFed?

**We have** many questions concerning the Environmental Water Account (EWA). Who surrenders the storage space for the EWA water as it is stored in the reservoirs? How would the EWA have been used to avoid the June 1999 Delta smelt damage done to Delta exporters? Will the EWA water be used to protect non-native Delta species if they are on the threatened or endangered list? Who will fund the \$50 million dollars per year? How will the EWA provide fishery benefits above and beyond the 1994 Bay-Delta Accord, the CVPIA, the 1995 Delta Water Quality Control Plan, and ESA biological opinion demands in a dry year? Realistically the only way that the EWA will work is if there is additional surface storage both north and south of the Delta.

**We are** in full support of the Agricultural Water Management Council (AWMC) in developing the appropriate water conservation levels and certifying ag water suppliers that are implementing locally cost effective feasible measures. We fully support helping local and regional agencies to increase their water recycling programs. We encourage a voluntary water transfer program that is based on the "no injury rule." Transfers must address direct and indirect local and 3rd party impacts, and protect the local groundwater basins.

**We do** not agree with your opinion that the conversion of 243,000 acres of agricultural land is unavoidable. Numerous other federal and statewide programs are ongoing or proposed that would generate a negative impact on agriculture by expanding habitat for fish and wildlife.

Your Ecosystem Restoration Program alone could ultimately affect up to 900,000 acres of land through purchase, management and regulation. Up to 2,000,000 acres of food producing land could eventually be lost in the same Cal-Fed timeframe that we will have 20 million more Californians to feed. This reckless, shortsighted trend by our government agencies must be reversed. We strongly oppose these "takings" that redirect our precious land and water resources to less beneficial uses at the taxpayers expense.

We need to plan for the expected population growth of our state and the corresponding need for increased water supplies, water quality and water reliability. We do not need a one-sided approach that is basically a massive land and water grab by state and federal government agencies. Cal-Fed has lost the fragile balance that gave agriculture hope in the beginning. Most of your Revised Phase II document creates only the illusion of increased water supply. You hang your hopes on transfers, conservation, adaptive management and system flexibility. The only realistic new dependable supply is in the surface storage projects to be studied. And you have conveniently postponed the construction timetable due to politics, not sound science and judgement.

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